

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO**UNITED STATES DISTRICT COURT** MAY 27 2016

for the

District of New Mexico

United States of America )

v. )

Sophia Angelica MARTINEZ )

Defendant(s)

**MATTHEW J. DYKMAN**  
CLERK

Case No.

16mj2456

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 5/26/2016 in the county of Bernalillo in the  
Judicial District of New Mexico, the defendant(s) violated:*Code Section*

21 USC 841 (a)(1), (b)(1)(A)

*Offense Description*Possession of 500 grams or more of a  
mixture or substance containing a  
detectable amount of methamphetamine  
with intent to distribute

This criminal complaint is based on these facts:

\*\*\* SEE ATTACHED AFFIDAVIT \*\*\*

☒ Continued on the attached sheet.

Complainant's signature

Jarrell W. Perry, Special Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/27/2016City and state: Albuquerque, New Mexico

Judge's signature

Kirtan Khalsa U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

On May 26, 2016, Drug Enforcement Administration (DEA) Special Agent (S/A) Jarrell W. Perry, DEA S/A Gerald Maestas and DEA Task Force Officer (TFO) Clarence Davis were at the Amtrak Train Station, 320 First Street, Albuquerque, New Mexico to meet the eastbound Amtrak Train which makes a regularly scheduled stop in Albuquerque, New Mexico.

S/A Perry approached a female, later identified as Sophia Angelica MARTINEZ, who was sitting in her respective seat in the coach section, coach car number 412, of the Amtrak Train. S/A Perry displayed his DEA badge to MARTINEZ, identified himself as a police officer to MARTINEZ, asked for and received permission to speak with MARTINEZ. After a short conversation about her travel, S/A Perry asked MARTINEZ if she had any luggage with her and MARTINEZ said that she did not have any form of luggage with her on the Amtrak Train. S/A Perry believed this to be odd since the majority of female passengers travel with some form of luggage when traveling across the United States. MARTINEZ informed S/A Perry that she was traveling from Las Vegas, Nevada to Wichita, Kansas and that she lived in Wichita, Kansas. MARTINEZ also said that she traveled via the Amtrak Train to Las Vegas, Nevada and stayed a couple of days to visit her boyfriend, then later said that she traveled via airplane to Las Vegas, Nevada. S/A Perry knew from his experience that passengers transporting illegal narcotics often fly one-way and then travel one-way on their return trip via the Amtrak Train due to the lack of security on the Amtrak Train compared to airports.

S/A Perry located a black colored suitcase that was lying on the second shelf in the common luggage area of coach car number 412, the same car that MARTINEZ was traveling in. S/A Perry observed that the black colored suitcase did not have a name tag attached. S/A Perry walked the black colored suitcase and spoke to each passenger on coach car number 412 in an attempt to determine ownership. No one claimed ownership of the black suitcase, including MARTINEZ. MARTINEZ informed S/A Perry that she carried the black colored suitcase onto the Amtrak Train in Kingman, Arizona, when she

boarded the Amtrak Train for an unknown male, who also boarded the Amtrak Train in Kingman, Arizona. MARTINEZ said that she placed the black colored suitcase on the second shelf in the common luggage area of coach car number 412, the same spot where S/A Perry originally located the suitcase.

S/A Perry determined from his experience that the black colored suitcase was abandoned and opened it. S/A Perry located various women's clothing and three black duct-taped bundles that were concealed inside of the inner lining of the suitcase. S/A Perry immediately knew from his experience that the black duct-taped bundles were consistent with bundles of illegal narcotics.

Due to the totality of the circumstances, S/A Perry handcuffed MARTINEZ, thus placing her under arrest. MARTINEZ was removed from the Amtrak Train and transported to the Drug Enforcement Administration (DEA) Albuquerque District Office (ADO).

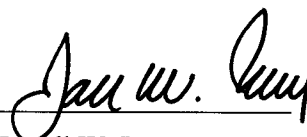
At the DEA ADO, S/A Maestas and TFO Davis removed the three black duct-taped wrapped bundles from the black suitcase. S/A Maestas and TFO Davis cut into two of the bundles, which revealed a clear crystal like substance. S/A Maestas and TFO Davis weighed the three bundles for a total weight of approximately 2.65 gross kilograms. S/A Perry knew from his experience that this amount is consistent with distribution rather than a personal use amount. S/A Perry and TFO Davis field-tested the clear crystal like substance from one of the bundles, which produced a positive reaction for the presence of methamphetamine.

Post Miranda, MARTINEZ admitted that she picked up the black colored suitcase that she originally said did not belong to her on the Amtrak Train in Las Vegas, Nevada. MARTINEZ said that she was responsible for transporting the black colored suitcase on the Amtrak Train from Las Vegas, Nevada to Wichita, Kansas and was to be paid \$3,000.00 for transporting and delivering the black colored suitcase. MARTINEZ said that she knew that the black colored suitcase contained drugs and believed that it was marijuana.

This affidavit is submitted for the limited purpose of providing probable cause to support the attached criminal complaint.



United States Magistrate Judge



Jarrell W. Perry  
Special Agent  
Drug Enforcement Administration